

In re:

Thomas J. Prim,
Debtor.

Case No. 23-10256-AMC

Chapter 13

Motion to Modify Plan After Confirmation

Debtor Thomas J. Prim, through his attorney, moves this Court as follows:

1. The Plan was confirmed on November 14, 2024. It is a 100% plan.
2. The Debtor wishes to amend the plan to lower the base plan amount to \$39,695.87 to conform to an amended claim that will soon be filed by creditor Karalis PC in the amount of \$17,000.00.
3. The Debtor therefore requests approval of the Second Amended Plan filed at ECF No. 111.

For those reasons, the Court must grant relief in the form of order attached, and further in the Debtor's favor if necessary and proper under the law.

Date: November 21, 2024

CIBIK LAW, P.C.
Attorney for Debtor

By: /s/ Michael A. Cibik

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